

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CONSERVATION LAW FOUNDATION, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 05-10487/NG
	)	
MITT ROMNEY, in his official capacity as	)	
GOVERNOR OF MASSACHUSETTS, et al.,	)	
	)	
Defendants.	)	
	)	

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**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Massachusetts Bay Transportation Authority (the “MBTA”) and Michael H. Mulhern, in his official capacity as General Manager of the MBTA (collectively the “Defendants”), move with Plaintiff’s assent for the Court to extend the time for them to answer or otherwise respond to Plaintiff’s Complaint from April 4, 2005 to and through April 15, 2005. As grounds therefore, the MBTA states as follows:

1. Plaintiff commenced this action by filing a Complaint on our about March 14, 2005. Copies of the Complaint were served upon the Defendants the same day.
2. The time for the Defendants to answer or otherwise respond to the Complaint expires on April 4, 2005. However, due to the number and complexity of the issues presented by the Complaint, the Defendants require additional time to conduct appropriate research and prepare their response.
3. Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Defendants states that it has conferred with counsel for Plaintiff and Plaintiff does not object to the brief extension of time requested by this motion.

WHEREFORE, Defendants respectfully request that the Court extend the time in which they must answer or otherwise respond to the Complaint from April 4, 2005 to and through April 15, 2005.

Respectfully submitted,

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY and MICHAEL H. MULHERN

By their attorneys,

/s/ Randall Kromm

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Randall Kromm (BBO #640940)  
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Dated: March 31, 2005

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Dean Richlin, hereby certify that on March 29, 2005, I conferred by telephone with Peter Shelley, counsel for the Plaintiff Conservation Law Foundation, in a good faith attempt to resolve or narrow the issues raised by this Motion and that Attorney Shelley does not object to this Motion.

/s/ Dean Richlin  
Dean Richlin